

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
ANDREW WONG  
3 Assistant Federal Public Defender  
Nevada State Bar No. 14133  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Andrew\_Wong@fd.org

7 Attorney for James Moore

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAMES MOORE,

15 Defendant.

Case No. 2:16-cr-325-JCM-NJK

**STIPULATION TO CONTINUE**  
**SENTENCING HEARING**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Patrick Burns, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Andrew Wong , Assistant Federal Public Defender, counsel for James Moore, that the  
21 Sentencing Hearing currently scheduled on May 17, 2019 at 11:00 a.m., be vacated and  
22 continued to a date and time convenient to the Court, but no earlier than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. Undersigned counsel was out of the office for the past week and needs additional  
25 time to disclose the presentence investigation report to Mr. Moore.  
26

2. Counsel also needs additional time to review the report and address any issues informally with the probation office prior to filing a sentencing memorandum.

3. The defendant is in custody and does not oppose a continuance.

4. The parties agree to the continuance.

This is the first request for a continuance of the sentencing hearing.

DATED this 22<sup>nd</sup> day of March, 2019.

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

*/s/ Andrew Wong*  
By \_\_\_\_\_

ANDREW WONG  
Assistant Federal Public Defender

*/s/ Patrick Burns*  
By \_\_\_\_\_

PATRICK BURNS  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:16-cr-325-JCM-NJK

4 Plaintiff,

**ORDER**

5 v.

6 JAMES MOORE,

7 Defendant.

8  
9  
10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for  
11 Friday, May 17, 2019 at 11:00 a.m., be vacated and continued to July 18, 2019 at  
12 the hour of 10:00 a.m.; or to a time and date convenient to the court.

13 DATED March 27, 2019.

14  
15   
16 UNITED STATES DISTRICT JUDGE